

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

**DECLARATION OF DANIEL MCGONAGLE IN SUPPORT OF  
PLAINTIFF'S MOTION TO COMPEL GOOGLE TO RESPOND TO  
INTERROGATORIES AND PRODUCE DOCUMENTS  
RELATING TO DAMAGES**

I, Daniel McGonagle, hereby declare as follows:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for the plaintiff, Singular Computing LLC ("Singular") in this action. I submit this declaration in support of Singular's motion to compel defendant, Google LLC ("Google"), to respond to interrogatories and produce documents relating to damages.

2. Attached hereto as Exhibit A is a true and correct copy of Singular's Third Set of Interrogatories [Nos. 12-20] to Google in this case.

3. Attached hereto as Exhibit B is a true and correct redacted copy of Google's Response and Objection to Plaintiff's Third Set of Interrogatories [No. 12-20].

4. Attached hereto as Exhibit C is a true and correct copy of Singular's First Set of Requests for Production (Nos. 1-102) to Google in this case.

5. Attached hereto as Exhibit D is a true and correct copy of Google's Responses and Objections to Plaintiff's First Set of Requests for Production (Nos. 1-102).

6. Attached hereto as Exhibit E is a true and correct copy of an email exchange between Dan McGonagle and Deeva Shah dated May 12, 2021.

7. Attached hereto as Exhibit F is a true and correct copy of an email exchange between Dan McGonagle and Deeva Shah dated May 13, 2021.

8. Attached hereto as Exhibit G is a true and correct copy of another email exchange between Dan McGonagle and Deeva Shah dated May 13, 2021.

9. Attached hereto as Exhibit H is a true and correct copy of an iam-media article dated March 27, 2015, titled “IBM has sold over 15,000 patents since 1991; Google is its biggest customer,” last downloaded from [www.iam-media.com](http://www.iam-media.com) on May 18, 2021.

10. Attached hereto as Exhibit I is a true and correct copy of a Samsung press-release dated January 27, 2014, titled “Samsung and Google Sign Global Patent License Agreement,” last downloaded from <https://news.samsung.com> on May 18, 2021.

11. Attached hereto as Exhibit J is a true and correct copy of a World Intellectual Property Review article dated May 2, 2014, titled “Cisco and Google sign patent deal,” last downloaded from [www.worldipreview.com](http://www.worldipreview.com) on May 18, 2021.

Executed at Boston, Massachusetts on May 18, 2021.

/s/ Daniel McGonagle